

EXHIBIT F

DECLARATION OF PETER GARZA

I, Peter Garza, hereby make the following declaration under penalty of perjury under the laws of the United States. I declare that the facts stated herein are true, correct and within my own personal knowledge. If called as a witness and sworn I could and will competently testify to these facts.

1. I am a Senior Vice President with First Advantage Litigation Consulting ("FADV"), a firm specializing in computer forensics and electronic discovery. Prior to joining FADV, I was the founder and President of EvidentData, Inc. ("EvidentData"), a computer forensics firm located in Rancho Cucamonga, California. I have worked as a computer forensics expert in hundreds of civil litigation cases. I have performed analysis of computer evidence in enterprise environments which have included investigation of computer intrusions, human relations issues, theft of trade secrets and trademark infringement, along with criminal investigations for the FBI, the Securities and Exchange Commission and other state and local law enforcement agencies. In hundreds of cases I have worked, both as a federal agent during the 1980's and 1990's and since then as expert consultant, I have worked in enterprise computing environments. Both my staff and I work with computer network and systems professionals at every level on a daily basis. My graduate degree is in MSMIS (Master of Science Management Information Systems) from Claremont Graduate University. I have recruited and trained analysts with Information Systems degrees and have extensive experience in evaluating technical tasks and assessing technicians' and analysts' skill level. A true and correct copy of my resume is attached hereto as Exhibit 23.

2. In conducting my analysis, I reviewed the following materials:

- A. Deposition transcript of Amedeo Discepolo, dated February 20, 2008, with exhibits 1-12;
- B. Deposition transcript of Thomas Saranello, dated February 7, 2008, with exhibits 1-8;

- 1 C. Deposition transcript of Carmelo Millan, dated January 16, 2008, with
- 2 exhibits 1-16;
- 3 D. Complaint and Jury Demand, case number 07 CIV 3769, May 11,
- 4 2007;
- 5 E. Citigroup Technology Infrastructure NISS Policies and Procedures
- 6 Manual, dated April 10, 2003, Version 1.7;
- 7 F. Citigroup Technology Infrastructure NISS Policies and Procedures
- 8 Manual, dated August 29, 2003, Version 1.8;
- 9 G. Amended Complaint and Jury Demand, case number 07 CIV 3769,
- 10 September 21, 2007;
- 11 H. Defendants' Memorandum of Law dated February 25, 2008;
- 12 I. Defendants' Statements of Undisputed Facts, dated February 22, 2008;
- 13 J. Printout of CertCities.com article titled "Cisco To Launch New CCNA
- 14 Exam, Add Two-Exam Option for Less-Experienced Candidates,"
- 15 dated June 23, 2003, attached as Exhibit 24;
- 16 K. Web page titled "Certifications Overview - IT Certification and Career
- 17 Paths - Cisco Systems," printed March 12, 2008, attached as Exhibit
- 18 25;
- 19 L. Web page titled "CCNA - Career Certifications & Paths - Cisco
- 20 Systems," printed March 12, 2008, attached as Exhibit 26;
- 21 M. Web page titled "ICND - IT Certification and Career Paths - Cisco
- 22 Systems," printed March 12, 2008, attached as Exhibit 27; and
- 23 N. Fluke Networks brochure for MicroScanner Cable Verifier,
- 24 downloaded March 12, 2003, attached as Exhibit 28.

25

26 3. Mr. Carmelo Millan worked for Citigroup Technology, Inc. ("CTI") and

27 Citigroup, Inc. ("Citi") (collectively referred to as "Citigroup") from about June

28 2000 until March, 2007. Mr. Millan's resume lists his position as "Network

Analyst” with Salomon Smith Barney from June 2000 until January 2003. From this position, Mr. Millan took the position of “Lab Coordinator” for Citigroup, which he held until March of 2007. Review of the items referenced above reveal that the technical aspects of Mr. Millan’s work involved a level of technical skill, but did not rise to the level of systems analysis which one would associate with more advanced education and involving independent judgment and decision making. Mr. Millan is obviously an accomplished technician who sought trade certifications and was diligent at tasks assigned. My review of the documents provided by Mr. Millan’s counsel revealed that Defendants’ characterization of Mr. Millan’s work attributed an exaggerated level of sophistication and incorrectly implied elements of systems analysis to what are routine technical tasks which adhere to established standards and requirements.

4. As an expert consultant in computer evidence, I have observed that what are routine technical tasks to a computer technician may be perceived as overly complex and sophisticated to a layperson unfamiliar with the industry. Defense Counsel makes this mistake in the characterization of the Cisco ICND as a “certification” and the CCNA as an “advanced networking certification.” The Interconnecting Cisco Networking Devices (“ICND”) exam is not a certification, it is a test administered as part of the Certified Cisco Network Associate (“CCNA”) certification. Cisco Systems, Inc. (“Cisco”) is a manufacturer of enterprise networking devices which also provides three levels of certification: Associate, Professional, and Expert.

5. Defense Counsel accurately states in the Defendants’ Statement of Undisputed Facts dated February 22, 2008, that the “CCNA certification validates an individual’s *“ability to install, configure, operate and troubleshoot medium-sized routed and switched networks, including implementation and verification of connections to remote cities in a [Wide Area Network].”*” This excerpt from the Cisco Systems “CCNA - Career and Certifications” page (Exhibit 4 of Millan

deposition) cited by Defense Counsel goes on to state “...curriculum includes basic mitigation of security threats, introduction to wireless networking concepts and terminology, and performance-based skills. This new curriculum also includes (but is not limited to) the use of these protocols: IP, Enhanced Interior Gateway Routing Protocol (EIGRP), Serial Line Interface Protocol Frame Relay, Routing Information Protocol Version 2 (RIPv2), VLANs, Ethernet, access control lists (ACLs).” Even Defense Counsel’s characterization of Mr. Millan’s position “telecommunications analyst” cannot change the fact that the CCNA certification is not an advanced networking certification. The Cisco Learning website cited by Defense counsel provides information about their three levels of certification. The Associate level attained by completing the CCNA is considered only slightly above the Certified Cisco Entry Network Technician (“CCENT”) shown in Graphic 1, which shows Cisco’s graphic representation of these lower level certifications below the Professional and Expert advanced-level certifications (Exhibit 4 Millan Deposition). As indicated in Graphic 1, Mr. Millan’s CCNA certification is only an entry-level networking certification.



Graphic 1

6. On the Cisco web site cited by Defense Counsel during Mr. Millan’s deposition there is a page titled “Certifications Overview - IT Certification and Career Paths” which states the following:

“Think of the Associate level as the apprentice or foundation level of networking certification.”

7. Further, the Cisco Learning website cited by Defense Counsel lists a June 2003 article on the information technology (“IT”) certification web site CertCities.com titled “Cisco to Launch New CCNA Exam, Add Two Exam Option for Less Experienced Candidates” pertaining to a new version of the ICND exam

1 for CCNA certification. This article emphasizes Cisco's intent to attract entry-level
2 candidates to the CCNA certification, and further illustrates that the CCNA is not
3 "advanced networking certification."

4 8. The long list of technical tasks cited by Defense counsel from the CCNA
5 certification web page are obviously not considered by Cisco as an advanced skill
6 set in their certification career path. All the tasks mentioned above from the CCNA
7 are well defined tasks that adhere to industry or Cisco standards. The CCNA trade
8 certification ensures that technicians are aware of set protocols for operating Cisco
9 networks. Whether it is configuring devices that route connections (switches and
10 routers) or working on the cable connections between network devices, the manual
11 technical tasks Mr. Millan describes in his deposition, which witnesses confirm,
12 and which Defense Counsel goes to great length to list, are a technician's set of
13 tasks in implementing standards or designs established by others. It is not to say
14 that Mr. Millan's tasks are not relevant or requiring a level of technical skill. They
15 do, however, lack elements of independent judgment or discretion nor do they
16 involve the application of systems analysis or design skills.

17 9. Defense Counsel explains Mr. Millan worked
18 on "diagnosing, troubleshooting and resolving
19 company-wide network problems." Among the tools
20 Defense Counsel lists are "butt sets." This simple
21 device, depicted in Graphic 2, also obtained from the
22 Cisco web site, is used by telephone repairman to test
23 connectivity in phone lines by clipping leads to a pair of



Graphic 2

24 phone line contacts or wires. Along with other devices, listed by Defense Counsel,
25 or mentioned by witnesses, Mr. Millan performed set technical tasks requiring
26 knowledge of cabling and connectivity, but did not require Mr. Millan design a
27 solution to the problem. Mr. Saranello mentioned a Microscanner device used to
28 test cables in his deposition. This device is made by Fluke Networks. As Mr.

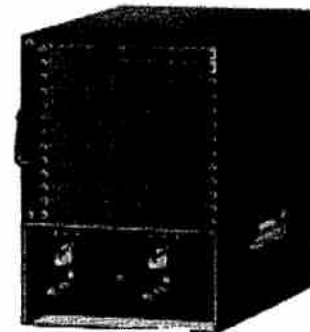
1 Saranello testified, this device is used to verify that there were no faults in network
2 cables. This device uses a simple interface to allow technicians to do a battery of
3 tests. These devices merely test to determine if devices are operating within set
4 parameters, along with set trouble-shooting protocols Mr. Millan would apply
5 solutions established by Cisco or industry standards.

6 10. The technical tasks described by Mr. Millan, by witnesses and by
7 Defense Counsel are not the type of systems analysis tasks associated with
8 developing requirements with clients and designing a solution as a systems analyst
9 with an advanced degree might perform. My review of the documents provided by
10 Mr. Millan's counsel indicated to me that Mr. Millan did not make decisions
11 regarding the systems he supported. Engineers designed systems and as a
12 technician who tested cabling, for instance, he provided support to the engineer
13 regarding the physical run of cable that would be needed. As a carpenter might
14 provide feedback to an architect in the implementation of a design, so did Mr.
15 Millan apply his on-site knowledge in the physical execution of an engineer's
16 network design. Understanding the physical layout of a "stack" of computers in a
17 server room or the distance between network devices does not require a significant
18 amount of discretion. Either it was less than 330 feet, as Mr. Saranello points out in
19 his deposition, or was not.

20 11. Mr. Saranello testified about the established process of enabling and
21 disabling ports for devices on the network. Mr. Saranello explained that among the
22 tasks that network technicians did was to facilitate user's connections to the
23 network when changes were made. This involved working with other Citigroup
24 technical staff when, for instance, moving a user or group of users from one
25 physical location to another. Mr. Saranello related that as a network technician in
26 Network Integration with Salomon Smith Barney, he was tasked with enabling the
27 network connections for a user or groups of users. The tasks associated with
28 facilitating connectivity for devices on the Citigroup network was also a large part

1 of what Mr. Millan performed as Network Analyst and later Lab Coordinator. As
2 Mr. Saranello testified, this network connectivity involved creating a connection
3 from the device in question, for example a personal computer ("PC") on a user's
4 desk, to the Citigroup local area network ("LAN") which serviced the user's
5 physical location. In the most basic form, a cable is connected to the personal
6 computer, the cable runs to a hub. The hub may be connected to the broader
7 enterprise network via a router. The ports on the hub simply provide the connection
8 for the cable. The port looks much like a traditional phone jack only a bit larger.
9 Network cables have four pairs of wires (eight wires) compared to the two pairs of
10 wires in traditional telephone cables. The ports on hubs do not have settings which
11 can be used to manage the network. A network segment for an office or a floor of a
12 building is created by connecting cables to the hub and connecting the other end of
13 the cables to the devices. This creates a physical local area network.

14 12. In enterprise environments devices called managed switches, like the
15 Cisco devices described by Mr. Millan and the other witnesses, are designed to
16 allow operators to create more sophisticated networks with the software embedded
17 in the device. Like a hub, a switch has ports for connecting network cables which
18 connect devices on the network. The devices connected to a hub are on one LAN.
19 In contrast, a switch can separate connected devices into multiple LANs even
20 though they are physically connected to the same switch. By using settings in the
21 software on the switch, groups of devices are
22 separated into virtual local area networks
23 ("VLAN"). The device depicted in Graphic 3 is a
24 Cisco 5500 switch. This type of switch is among
25 the types of devices Mr. Millan supported. Mr.
26 Millan and other witnesses testified that his duties
27 involved verifying the cables that plugged into this
28 type of device and they also included requesting



Graphic 3

1 changes to the settings on these switches. Changes involved the network addresses
2 assigned to the ports or simply turning them off and on. Mr. Millan testified that
3 the ability to make these simple changes in the Cisco switches was removed his
4 duties and responsibilities early in his position as Network Analyst. Mr. Millan
5 testified he entered these changes in a database used to track these settings.

6 13. Mr. Millan's duties as a Network Analyst and Lab Coordinator with
7 Citigroup did not involve systems analysis or design of the network in which
8 devices like this Cisco switch were incorporated. His duties were lower-level
9 technical support functions to ensure that the physical equipment that attached the
10 devices on the Citigroup network operated within set parameters and according to
11 set procedures. Even in Mr. Millan's later position as Lab Coordinator, his
12 technical role was supporting the physical connectivity of the network, which
13 involved a higher number of devices, but did not change the technical level of his
14 duties.

15 14. Mr. Discepolo testified that one might consider the tasks Mr. Millan
16 performed in spreadsheet-lists of "inventory and the elevation drawings and the
17 connectivity database" as programming. This is simply incorrect. Programs like
18 Microsoft Excel, which Mr. Millan used for these tasks, are simple to use programs
19 requiring only basic skills for the most common tasks, like creating lists of
20 inventory. I have used Microsoft programs for many years and have used systems
21 analysis tools to design databases and database applications (programs that provide
22 a user interface to databases) and know that Microsoft Excel is not this type of
23 program. Nor is Microsoft Excel a programming environment. I have performed
24 systems analysis and design work executed by programmers in programming
25 environments. Although programs can be written by users that interact with
26 Microsoft Excel, the simple tasks mentioned in Mr. Discepolo's testimony clearly
27 do not involve any programming.
28

1 15. I reviewed the performance evaluations of Mr. Millan, Mr. Millan's
2 resume, the deposition testimony of witnesses along with Defendants' Statements
3 of Undisputed Facts and observe that Mr. Millan's technical duties with Citigroup,
4 both in his earlier position as a Network Analyst and later as a Lab Coordinator
5 involved low-level technical functions. Although Mr. Millan had begun the process
6 of obtaining computer trade certifications, technicians in this type of position at
7 Citigroup were not required to possess those certifications. The CCNA certification
8 he had obtained is considered by the industry leader, Cisco, as an entry-level
9 certification involving the types of technical tasks Mr. Millan performed at
10 Citigroup. The work Mr. Millan performed as a computer employee with Citigroup
11 did not involve systems analysis techniques or procedures. Although Mr. Millan
12 did consult with users, it was not to determine system specifications. Mr. Millan's
13 interaction with users was in the application of well-established procedures and
14 industry standards applied to the placement of network devices and resolving
15 connectivity issues.

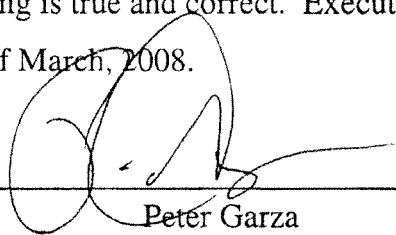
16 16. Mr. Millan's duties with Citigroup did not involve computer systems
17 design. In the material I reviewed it was clear to me that Mr. Millan may have
18 reviewed network designs prepared by network engineers and provided input
19 regarding his knowledge of the physical placement of devices, however, he did not
20 create the network designs or specifications. Nor did Mr. Millan's duties have any
21 involvement with the design, documentation, testing, creation or modification of
22 computer programs related to machine operating systems. It is clear that the
23 combination of duties Mr. Millan performed for Citigroup required a level of
24 technical skill, but did not rise to the level of computer systems analysis or
25 engineering.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed at
2 Rancho Cucamonga, California on this 14th day of March, 2008.

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6 Peter Garza
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News

Cisco To Launch New CCNA Exam, Add Two-Exam Option for Less-Experienced Candidates

6/23/2003 -- This week at its Networkers conference in Orlando, Cisco Systems will announce a new Cisco Certified Network Associate (CCNA) exam, 640-801, to launch June 30.

The current CCNA exam (640-607), which debuted in [March 2002](#), includes understanding the functions and operations of local area networks (LAN), Cisco IOS fundamentals, wide area networks (WAN), virtual private networks (VPN), and Storage Area Networks (SAN). Other topics covered are IP Addressing, Cisco Command Line Interface (CLI), Routing and Switching technologies and protocols. (**Editor's Note:** [TCPmag.com](#) provides a review of this exam, written by CCNP Andy Barkl, [here](#).)

Nader Nanjiani, marketing programs manager of the Internet Learning Solutions Group at Cisco, said the 801 version of the CCNA exam has been dated to cover switching configuration, Open Shortest Path First (OSPF) and Enhanced Interior Gateway Routing Protocol (EIGRP) protocols, and variable length subnet masking.

"This exam is more in-depth than 607, not a reduction," he commented. "These topics were already included in the ICND class that we're teaching now... [So] anyone who's taken the [Interconnecting Cisco Network Devices] course that was already out, [he or she] should be able to pass the new exam, because now [the exam] covers the chapters that weren't necessarily covered before."

The 640-607 exam is scheduled to retire Sept. 30, although candidates will be able to take the exam into early October as long as they schedule the test by the earlier date.

At the same technical conference for Cisco professionals, the company will also announce a new two-exam approach to the CCNA.

According to Nanjiani, the two new exams -- INTRO 640-821 and ICND 640-811 -- cover exactly the same content as the soon-to-debut 801 exam, but the information is split, with higher-level content in the ICND, and lower-level content in INTRO. "Now you have the option of taking a single exam if you can handle the content in one fell swoop... or piecemeal if you want to take more time," Nanjiani explained.

The INTRO test is currently available in beta form as 641-821. Nanjiani estimated that it would be available in live form in eight to 12 weeks. A corresponding course will be available later in July. The ICND exam will be available on June 30. Each exam will be valid for three years.

Nanjiani said that candidates will be able to choose for themselves which CCNA path to take; Cisco is only recommending that those with less networking experience choose the two-exam option. "We were hearing from our training partners that people were coming to the ICND class and having a difficult time keeping up...they didn't have the networking background," he explained. "No one is going to stop you, but [the INTRO exam] is a way for an individual to see how he or she stands before jumping into the ICND courses."

With the two-exam approach, candidates need to take the required exams within three years of each other to earn their CCNA. Both exams are 30 minutes shorter than the typical Cisco exam (60 minutes vs. 90 minutes) and will cost \$100 each as opposed to the standard \$125.

CertCities.com | Print News: Cisco To Launch New CCNA Exam, Add Two-Exam Optio... Page 2 of 2

Passing either the ICND or INTRO exams alone does not earn the candidate any title, Nanjiani said, although current CCNAs will be allowed to use the new ICDN exam as a renewal requirement.

Nanjiani said that the company may consider offering a similar two-exam path for its Cisco Certified Design Associate (CCDA) title, depending on customer feedback.

More information on these announcements should be published on Cisco's Web site [here](#) on Tuesday. ■ -Becky Nagel, Dian L. Schaffhauser

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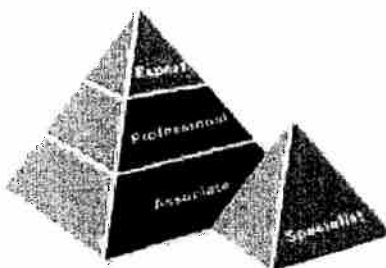


IT Certification and Career Paths

Certifications Overview

General Certifications and Focused Certifications

The first step in general Cisco Career Certifications begins either with CCENT as an interim step to Associate level, or directly with CCNA for network operations or CCDA for network design. Think of the Associate level as the apprentice or foundation level of networking certification.



General Certifications: Three Levels of Certification

- **Associate:** The first step in Cisco networking begins at the Associate level, which also includes CCENT, an interim step to Associates for those with little job experience. Think of the Associate level as the apprentice or foundation level of networking certification.
- **Professional.** This is the advanced or journeyman level of certification.
- **Expert.** This is CCIE, the highest level of achievement for network professionals, certifying an individual as an expert or master.

General Certifications: Six Different Paths

- **Routing and Switching:** This path is for professionals who install and support Cisco technology-based networks in which LAN and WAN routers and switches reside.
- **Design:** This path is aimed at professionals who design Cisco technology-based networks in which LAN and WAN routers and switches reside.
- **Network Security:** This path is directed toward network professionals who design and implement Cisco Secure networks.
- **Service Provider:** This path is aimed at professionals working with infrastructure or access solutions in a Cisco end-to-end environment primarily within the telecommunications arena.
- **Storage Networking:** This path is for professionals who implement storage solutions over extended network infrastructure using multiple transport options.
- **Voice:** This path is directed toward network professionals who install and maintain Voice solutions over IP networks.

Focused Certifications: Specialist

A variety of Specialist focused certifications are available to show knowledge in specific technologies, solutions, or job role. New certifications are added to this list regularly.

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Recent Articles

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Current	2007	2006	2005	2004	2003
Dec 03					Certification Magazine - Paying Off Nicely - CertMag's 2003 Salary Survey ☐ "From entry-level programs like CompTIA's A+ to advanced certifications like the Cisco Certified Internetwork Expert (CCIE), each certification program studied provided a noteworthy salary to IT experts."
11 Nov 03					CertCities Online - Cisco IP Telephony Certs Double in 2003 ☐ "Cisco Systems announced today that the number of IT professionals holding its IP telephony-related specialty certifications 'more than doubled' from December 31, 2002, to July 1, 2003."
05 Nov 03					TMCnet.com - Customer Satisfaction, Italtel Ranks Among The First Companies In EMEA ☐ "Italtel, one of the world's leaders in integrated voice, data and video tlc networks, ranked third among system Integrators in EMEA and first among companies operating with service providers, in terms of customer satisfaction. This is the outcome of a survey conducted by Cisco Systems which assessed Italtel's performances through thirty questions placed to the most qualified service providers and network operators in EMEA."
04 Nov 03					CertCities.com - CCIE Program Celebrates 10th Anniversary ☐ "When Cisco launched the CCIE in Nov. 1993, it was Cisco's first certification program. The company later added other professional- and associate-level titles, such as the Cisco Certified Network Associate (CCNA) and the Cisco Certified Network Professional (CCNP)."
28 Oct 03					CertCities.com - Cisco Extends 2 Betas ☐ "Cisco Systems recently extended the life of two beta exams: 643-531 CSIDS, which counts toward the company's Cisco Certified Security Professional (CCSP) title, and 641-821 INTRO, which is part of the new two-exam Cisco Certified Network Associate (CCNA) track."
21 Oct 03					NetworkWorld Fusion - A Place for CCIEs to Convene ☐ "Cisco this month officially launched a free resource to help your IT staffers do their jobs better - the Cisco Certifications Community."
09 Oct 03					Enterprise Networks & Servers - Cisco Offers Certification Site ☐ "Cisco Systems has officially launched the Cisco Certifications Community, a knowledge sharing portal exclusively for Cisco certified individuals."
30 Sep 03					SearchNetworking.com - Cisco Reports Ramp-up in IP Telephony Certs ☐ "Cisco Systems Inc. recently announced that the number of IP telephony certifications it issued between Dec. 31, 2002, and July 2003 was equal to the number of all IP telephony certs the company had previously issued."
29 Sep 03					NewsFactor Network - Tech-Job Certifications That Still Matter ☐ "For IT professionals looking to advance their career or move into another specialty, tech certifications present a gateway. In these

- post-boom years, most IT professionals now know that certification does not equal employment and a high salary. All those tests and fees have become a turnoff for many."
- 16 Sep 03 [Enterprise Networks & Servers - Cisco Networking Academy Launches Security and Wireless Curricula](#) ☐
"After an initial pilot phase that attracted over 250 Academy participants, the Networking Academy program is launching the courses globally."
- 15 Sep 03 [CRN Online - Vendors Can Influence VAR's Certification Training Decisions](#) ☐
"While there is little difference across solution provider size for the Microsoft MSCE or Cisco CCNA certifications, there are distinct differences in other cases."
- 10 Sep 03 [The Register - Cisco CCNA Self-Study Guides](#) ☐
"Cisco Systems has introduced a new CCNA certification, with two paths to attain that valued title."
- 09 Sep 03 [CertCities Online - Cisco Renames CCIE, Communications and Services](#) ☐
"The company said in a Web site statement that the renaming aligns the credential more closely with the segment of the IT community that it serves."
- Sep 03 [Certification Magazine - Cisco Exam Study Strategies](#) ☐
"Given that Cisco's is one of the three biggest IT certification programs, and that exam preparation material is readily available to candidates, an organized program of study is the best approach to tackling any Cisco certification exam."
- 22 Jul 03 [TCPmag.com - Cisco Launches Updated CCSP Exams](#) ☐
"Several of the updated exams also count toward the company's security-related Cisco Qualified Specialist titles, which candidates can earn on their way to pursuing the CCSP or individually."
- 25 Jun 03 [Certification Magazine - Certifiably Secure: Cisco Certified Security Professional \(CCSP\)](#) ☐
"As Cisco's newest professional level certification, the CCSP has attracted a great deal of interest and attention in the marketplace."
- 23 Jun 03 [Certcities - Cisco to Launch New CCNA Exam, Add Two Exam Option for Less Experienced Candidates](#) ☐
"This week at its Networkers conference in Orlando, Cisco Systems will announce a new Cisco Certified Network Associate (CCNA) exam, 640-801, to launch June 30."
- 18 Jun 03 [Certification Magazine - Cisco Expands Security Certification and Training Portfolio](#) ☐
"Cisco Systems Inc. announced the expansion of its security certification and training program to reflect the latest advances in Cisco security technology and industry expectations for IT professionals."
- 17 Jun 03 [Certcities - Cisco Debuts Security Design Courses, Considering Cert](#) ☐
"Now [students] can see different designs...[what will happen, for example] when you put the firewall in series with the VPN or in parallel."
- 20 May 03 [Yahoo! Financial - Cisco Enhances Career Certifications Tracking System](#) ☐
"Cisco Systems, Inc.® today announced enhancements to the Cisco Career Certifications Tracking System, a secure database that provides a record of exam history and certification progress for Cisco career-certified professionals worldwide."

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IT Certification and Career Paths

640-811 ICND

Interconnecting Cisco Networking Devices Exam

Retired November 6, 2007

Exam Number: 640-811
Associated Certifications: CCNA
Duration: 60 minutes (40-50 questions)
Available Languages: English
Click Here to Register: [Pearson VUE](#)
Exam Policies: [Read current policies and requirements](#)
Exam Tutorial: [Review type of exam questions](#)

[Exam Description](#) [Exam Topics](#) [Recommended Training](#) [Additional Resources](#)

Exam Description

The ICND exam is one of the two qualifying exams available to candidates pursuing a two-exam option for the Cisco Certified Network Associate CCNA certification. The ICND (640-811) exam will test materials from the new Interconnecting Cisco Network Devices (ICND) course. The exam will certify that the successful candidate has important knowledge and skills necessary to select, connect, configure, and troubleshoot the various Cisco networking devices. The exam covers topics on Extending Switched Networks with VLANs, Determining IP Routes, Managing IP traffic with Access Lists, Establishing Point-to-Point connections, and Establishing Frame Relay Connections.

Exam Topics

The following information provides general guidelines for the content likely to be included on the exam. However, other related topics may also appear on any specific delivery of the exam. In order to better reflect the contents of the exam and for clarity purposes the guidelines below may change at any time without notice.

Planning and Designing

- Design or modify a simple LAN using Cisco products
- Design an IP addressing scheme to support classful, classless, and private addressing to meet design requirements
- Select an appropriate routing protocol based on user requirements
- Design a simple internetwork using Cisco products
- Develop an access list to meet user specifications
- Choose WAN protocols to meet design requirements

Implementation and Operations

- Perform an initial configuration on a switch
- Configure routing protocols given user requirements

- Configure IP addresses, subnet masks, and gateway addresses on routers and hosts
- Configure a router for additional administrative functionality
- Configure a switch with VLANs and inter-switch communication
- Implement a LAN
- Customize a switch configuration to meet specified network requirements
- Implement access lists
- Implement simple WAN protocols

Troubleshooting

- Utilize the OSI model as a guide for systematic network troubleshooting
- Perform LAN and VLAN troubleshooting
- Troubleshoot routing protocols
- Troubleshoot IP addressing and host configuration
- Troubleshoot a device as part of a working network
- Troubleshoot an access list
- Perform simple WAN troubleshooting

Technology

- Describe the Spanning Tree process
- Evaluate the characteristics of LAN environments
- Evaluate the characteristics of routing protocols
- Evaluate rules for packet control
- Evaluate key characteristics of HDLC, PPP, Frame Relay, DDR, and ISDN technologies

Recommended Training

Interconnecting Cisco Networking Devices (ICND) is the recommended training for this exam.

Courses listed are offered by Cisco Learning Partners, the only authorized source for Cisco IT training delivered exclusively by Certified Cisco Instructors. Check the [Global Learning Partner Locator](#) for a Cisco Learning Partner near you.

Additional Resources

A variety of Cisco Press titles may be available for this exam. These titles can be purchased through the [Cisco Marketplace Bookstore](#), directly from Cisco Press.

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FLUKE
 networks


MicroScanner² Cable Verifier

Raising cable verification to a higher power

For more than a decade, cabling installation and maintenance technicians have relied on MicroScanner to verify terminations and troubleshoot continuity faults. A lot has changed in the cabling world since the original MicroScanner was introduced. Industry economics require that installations be done fast and accurately with no callbacks. And converging voice, data, and video technologies have given rise to new requirements for service testing and multimedia support.

MicroScanner² recognizes these trends and presents a much-needed revolution to the way testing is done. It streamlines every aspect of the verification job. From its time-saving user interface and integrated multimedia support to its expanded service detection capabilities, MicroScanner² gives technicians the power to perform their jobs faster and more accurately than ever.

High power vision to verify voice/data/video cabling and services. That's Network Supervision.™ That's Fluke Networks promise to you.

Reduce test time and user error

Yesterday's cable verification testers force users to toggle between different modes (up to four) to view all test results. This not only slows the test process, but also causes user frustration and error. MicroScanner² has defied this convention by displaying key test results – wiremap, pair lengths, distance to fault, cable ID, and far-end devices – all on one screen.

Eliminate awkward test adapters

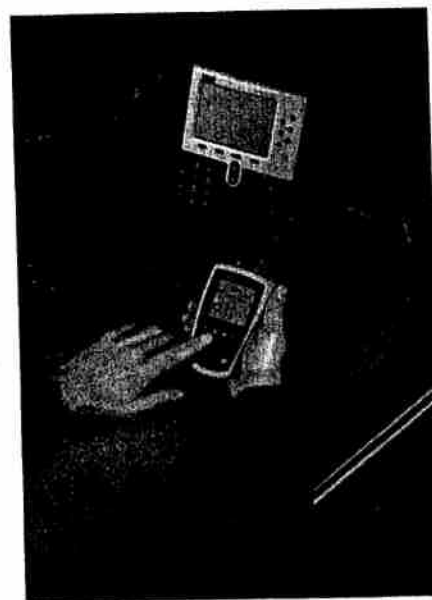
Tired of losing or breaking all the adapters needed for testing the various voice, data, and video media types? MicroScanner² makes these adapters things of the past with built-in RJ11, RJ45, and coax support. Both the main unit and the far-end identifiers can be used to test telephone jacks, Ethernet jacks, and CATV outlets right out of the box.

Rule out service problems fast

Today's communications technicians have more problems to deal with than just the cabling. They have to rule out a whole host of cable and service issues before determining the cause of a connectivity problem. Is there telephone voltage? What's the polarity? Is there a switch at the far end? Is PoE available? MicroScanner² gives technicians high power vision to verify today's most common voice, data, and video services.

Locate elusive cables in seconds

MicroScanner² features built-in IntelliTone digital and analog toning to precisely locate



virtually any cable or wire pair, regardless of work environment. Use digital mode to locate high-grade data cabling (Cat 5e/6/6a) in bundles, or at switches, patch panels, or wall outlets. Or, use analog mode on voice-grade cabling (Cat 3 and below), as well as coax, security/alarm, and speaker wiring.

Repair or replace tools less often

With all the abuse you put your tools through, you can't afford for them to be delicate. MicroScanner² features a rubber wrap-around holster that makes it the right tool for even the toughest jobs. Toss it into your toolbox. Drop it from a ladder. It can handle it. Plus, it now comes standard with a vinyl carry pouch for enhanced protection and convenience.

High power vision into voice/data/video cabling

Technical Data

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MicroScanner² Cable Verifier

Coax connector for video and audio testing

Rubber holster enhances durability and grip

Digital toning is safe and effective on active networks

Length meter shows distance to termination, open, or short

PoE detection rules out insufficient power as source of problems

Detail mode gives additional test status information



Wiremap adapter doubles as protective cap

Modular port accepts RJ45 and RJ11 plugs

Oversized LCD is backlit for crystal clear results

Intuitive icons show what's at the far end of any cable (10/100/1000 switch, POTS service, short, cable ID)

Graphical wiremap shows type and location of fault (miswires, reversals, split pairs, shorts, breaks)



Ordering Information

Model	Description
MS2-100	MicroScanner ² Cable Verifier
MS2-KIT	MicroScanner ² Professional Kit

Accessories	Description
MS2-IDK27	MicroScanner ² Remote Identifier Kit #2-7
MT-8200-63A	IntelliTone Pro 200 Probe
CLIP-SET	RJ45 to 8 - Clip Test Lead
CIQ-RJA	RJ45/11 Modular Adapter
CIQ-COAX	Coax Adapter Kit for RCA, BNC
MS2-CPK	MicroScanner ² Professional Kit Carry Case

Specifications and availability subject to change.

Specifications

Test Connectors	Twisted-pair: UTP, FTP, SSTP 8-pin modular jack accepts RJ45 and RJ11 Coax: F-connector for 75 Ω, 50 Ω, 93 Ω cables
Cable Tests	Length (460 m or 1500 ft), wiremap to TIA-568A/B standards, remote ID locators
Tone Generator	IntelliTone digital tone: [500 KHz]; analog tones: [400Hz, 1KHz]
PoE Detection	Solicits and detects the presence of 802.3af compatible PoE devices
Ethernet Port Test	Advertised speed of 802.3 Ethernet ports (10/100/1000)
Power Source	Battery type: 2 AA alkaline batteries
Dimensions	3 in x 6.4 in x 1.4 in (7.6 cm x 16.3 cm x 3.6 cm)
Weight	13 ounces; 363 grams (batteries included)
Warranty	One year

NETWORK SUPERVISION

Fluke Networks
P.O. Box 777, Everett, WA USA 98206-0777

Fluke Networks operates in more than 50 countries worldwide. To find your local office contact details, go to www.flukenetworks.com/contact.

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Printed in U.S.A. 3/2007 2798526 D-ENG-N Rev A

EXHIBIT B



FIRST Advantage
Facts first.

Peter Garza • Curriculum Vitae
Senior Vice President, Electronic Evidence

Name: Peter Garza
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Rancho Cucamonga, CA 91730
Telephone: 909.948.7714
Mobile: 909.994.3487
E-mail: peter.garza@FADV.com

Professional Experience

First Advantage Litigation Consulting – Senior Vice President
EvidentData, Inc. – President & Founder

October 2006 to present
November 1999 to October 2006

Peter Garza is Senior Vice President of First Advantage Litigation Consulting, specializing in computer forensics, electronic discovery, expert consulting. Mr. Garza has worked as an expert consultant in hundreds of civil cases, including lawsuits against Arthur Andersen and the Board of Directors of Enron, and a successful \$45 million lawsuit by sports agent Leigh Steinberg. Case assignments have included working as an independent expert, court-appointed special master, or otherwise advising courts on computer forensics and electronic discovery matters. Mr. Garza founded EvidentData, which was acquired by First Advantage in 2006. Mr. Garza continues to lead his team of computer forensics experts in a wide array of cases.

Naval Criminal Investigative Service – Special Agent

March 1989 to November 1999

Mr. Garza worked as a special agent with the Naval Criminal Investigative Service (NCIS), where he recovered and analyzed a wide array of computer evidence, including electronic business records used to expose defense procurement fraud, as well as electronic evidence used in successful criminal and counterintelligence investigations. As an agent with NCIS, Mr. Garza conducted the first court-ordered Internet wiretap in the United States while investigating the "El Griton" hacker case. The Argentine was convicted of using Harvard University's computer network as a staging point to hack in to computer networks at the Department of Defense, NASA, and other U.S. and foreign research sites.

Expert Consulting

- **Expert Consulting in Computer Evidence Protocols**
As an independent expert, Mr. Garza is often called upon to craft or review proposed protocols for the review of a producing party's enterprise systems, and balance production obligations with the protection of proprietary and sensitive information.
- **Computer Forensics and Electronic Discovery Consulting**
Routinely works with companies and their counsel, from pre-litigation investigation through to trial. Assists with identifying the universe of data, and then preserving and investigating relevant sources of electronic evidence.



- Special Master/Independent Expert for Court
Works as a special master or independent expert in electronic evidence. Works with litigants to resolve electronic evidence issues ranging from crafting acceptable computer evidence acquisition protocols, acceptable search and analysis protocols, along with proper privilege review by legal staff and method of production to opposing party.
- Expert Testimony
Has qualified as a testifying expert in computer forensics in federal and state courts. Cases have included testimony regarding operating system and software artifacts recovered in computer forensic analysis, testimony to show the failure to produce data, testimony in the analysis of metadata of questioned documents, and testimony regarding indicators of the use of evidence destruction software.

Case Examples

- Electronic Discovery Consulting in Large Production
Consulted with a healthcare provider who had used IT vendor to collect computer media across many locations with a large number of users. With a deadline looming, worked with outside counsel to plan and execute the processing of over one thousand items of electronic media with sparse information from IT vendor.
- Independent Expert in Theft of Trade Secrets Case
Developed protocol to properly acquire evidence within defendant's enterprise and perform forensic analysis. Identified proprietary information at issue in litigation, removed plaintiff's data from defendant's systems, and reported findings to court.
- Computer Forensics in Contract Dispute
Examined metadata in questioned documents. Metadata analysis showed opposing expert had missed crucial data, and that metadata showed documents had been edited as plaintiff claimed.
- Computer Forensics in Theft of Trade Secrets
Recovered remnant data which confirms theft of proprietary data by former employees of technology company. Inspection order is obtained and additional evidence is recovered from defendant's computers further confirming the theft.
- Expert Consulting in Production to Government Agency
Worked with client's counsel to respond to Department of Justice investigation. Directed forensic analysis of relevant user workstations. Met with Assistant U.S. attorney and successfully refuted charge of tampering with electronic evidence.
- Computer Incident Response and Remediation
Investigated report of compromise of popular web commerce site. Directed investigation, assisted with reporting to appropriate jurisdiction, and consulted on remediation plan.
- Internet Investigations - Prepared and executed the first court-ordered wiretap on an Internet connected network, exposing an Argentine computer hacker using Harvard University's network to compromise research-facility computer networks at the Department of Defense, NASA, and elsewhere around the world. The case was publicized by U.S. Attorney General Janet Reno in March 1996.

Other Relevant Experience

- Designed forensic protocols for computer forensic labs which he continues to manage



- Provides industry and CLE presentations to law firms and conferences
- Directs internal, and evaluates external, training programs to develop analyst staff in computer forensics

Education

- Master of Science in Information Systems, Claremont Graduate University, 2001
- Bachelor of Business Administration, National University, 1988

Teaching

- California State Polytechnic University, Pomona, 2004
 - Graduate level course in advanced computer forensics in Computer Information Systems Department
- Computer Security Institute, 2001-2002
 - Management of Information Technology Investigations
 - Technical recovery of Electronic Evidence

Training

Coursework successfully completed in investigative and computer-evidence topics including: criminal investigations, advanced interviewing, International Association of Computer Investigative Specialists computer seizure and computer-forensics examination, network-intrusion detection, Novell Networking Technologies, UNIX system administration, and Federal Law Enforcement Training Center Telecommunications Fraud and Computer Evidence Analysis Training Programs. Forensics software vendor training courses.

Recent Expert Deposition and Trial Testimony

- Bowlby, Laurie vs. McKernan, Mackenzie Scott, Case No. RFL-043564 (Superior Court, County of San Bernardino, California), May 2006.
- Caruso Affiliated Holdings, LLC vs. General Growth Properties, Inc., Case No. EC 038518 (Superior Court, County of Los Angeles, California), July 2007.
- Seth D. Bulow, M.D. vs. North County OB-GYN Medical Group, Inc., Case No. GIC 854573 (Superior Court, County of County of San Diego), September 2007.

* A complete list of cases in which Mr. Garza has provided trial or deposition testimony as a computer forensics expert available upon request.

Professional Memberships

- High Technology Crime Investigation Association, Past President Southern California Chapter
- International Association of Computer Investigative Specialists
- Forensic Expert Witness Association



EXHIBIT C



Peter Garza • Curriculum Vitae
Senior Vice President, Electronic Evidence

Expert Deposition and Trial Testimony of Peter Garza

McMillan, Eldon, et al., vs. Chrysler Corporation, et al., Case No. 99-9013-278-06 (District Court (278th District), Madison County, Texas), January 2002.

Cliff, Donald vs. Daimler-Chrysler Corporation, et al., Case No. 3:01-CV-186 (Eastern District, Tennessee), April 2002.

Comps Infosystems, et al., vs. Andrew Blount, et al., Case No. 00697714 (Superior Court, County of San Diego, California), April 2002.

People vs. Stephan Shoemaker, et al., Case No. 9SB04308 (Superior Court, County of Los Angeles, California), May 2002.

McKibbons, Phillip vs. International Business Machines, Inc., et al., Case No. CV-99-04465 (U.S. District Court, Central District of California), September 2002.

Steinberg, Moorad & Dunn, Inc. vs. David Dunn, et al., Case No. 01-7009 RSWL (U.S. District Court, Central District of California), October 2002.

Madison/Graham Colorgraphic, Inc. vs. Graphic Press, Inc., et al., Case No. 00CC12959 (Superior Court, County of Orange, California), April 2003.

Beckman Coulter, Inc. vs. Dovatron International, Inc., et al., Case No. 01CC08395 (Superior Court, County of Orange, California), July 2003.

Ampac JV Group, et al., vs. General Motors Corporation, et al., Case No. BC 206274 (Superior Court, County of Los Angeles, California), December 2004.

Epiphany, Inc. vs. Sigma Dynamics, Inc., et al., Case No. 439133 (Superior Court, County of San Mateo, California), May 2005.

Creative Science Systems, Inc., vs. Forex Capital Markets, LLC, et al., Case No. C04-03746 JF (U.S. District Court, Northern District of California), March 2006.

Bowlby, Laurie vs. McKernan, Mackenzie Scott, Case No. RFL-043564 (Superior Court, County of San Bernardino, California), May 2006.

Julie Hollen vs. Glendale Unified School District, et al., Case No. EC040414 (Superior Court, County of Los Angeles, California), August 2006.



Caruso Affiliated Holdings, LLC vs. General Growth Properties, Inc., Case No. EC 038518
(Superior Court, County of Los Angeles, California), July 2007.

Seth D. Bulow, M.D. vs. North County OB-GYN Medical Group, Inc., Case No. GIC 854573
(Superior Court, County of County of San Diego), September 2007.

